1	TZ A TELDAZAT IZDATO A T. Y. XZ		
1	KATHRYN KENEALLY Assistant Attorney General, Tax Divisi	ion	
2			
3	JESSICA S. REIMELT U.S. Department of Justice, Tax Divisi	on	
4	P.O. Box 7238, Ben Franklin Station Washington, D.C. 20044		
5	Telephone: (202) 307-2176 Email: <u>jessica.s.reimelt@usdoj.gov</u>		
6	Attorneys for Plaintiff, United States		
7	IN THE UNITED ST.	X 2	N 477 N 120 470 E N
8	FOR THE EASTERN DI	STRICT O	F WASHINGTON
9	UNITED STATES OF AMERICA,	)	Civil No. 13-cv-5053-EFS
10	Plaintiff,	)	CIVII NO. 13-CV-3033-EFS
11	V.	)	JOINT STIPULATION BETWEEN THE UNITED
12	RICHARD D. KEGLEY, RAMON	)	STATES AND WALLA
13	ZAMORA, ZAP BOXING YOUTH CENTER, RICHARD OF YHVH,	)	WALLA COUNTY CONCERNING INTEREST
14	OFFICE OF THE FIRST PRESIDING PATRIARCH, JAMIE	)	IN REAL PROPERTY
15	OF YHVH, OFFICE of the FIRST PRESIDING PATRIARCH, ERIN		Without oral argument No hearing required (LR 55.1)
16	CAPITAL MANAGEMENT, and WALLA WALLA COUNTY,	)	romaning requires (221 00/1)
17		)	
18	Defendants.	)	
	Digintiff United States and Defer	dont Walla	Walla County (the "County")
19	Plaintiff United States and Defen	idani wana	wana County (the County ),
20	by and through their undersigned couns	sel, respectfu	ally submit this Joint Stipulation
21	concerning their respective lien interest	ts in real pro	perty as set forth below:
,,			

1
2

1. On May 1, 2013, the United States filed suit to reduce to judgment federal tax assessments made against Richard Kegley and to foreclose its federal tax liens that encumber a parcel of real property located at 2344 Old Milton Highway, Walla Walla, Washington with the following legal description:

Beginning at a point in the South line of the Northeast Quarter of the Southeast Quarter of Section 2 in Township 6 North of Range 35, East of the Willamette Meridian, which point is 5.74 feet, measured along said South line from the center of the Southeast Quarter of said Section and running thence East, along said South line 100.0 feet; thence North 668.22 feet, more or less, to the North line of the Southwest Quarter of the Northeast Quarter of the Southeast Quarter of said Section; thence West along said North line, 100.0 feet; thence South 668.22 feet, more or less, to the point of beginning. Subject to existing road on the South. Situate in the County of Walla Walla, State of Washington.

(Docket No. 1, ¶ 28.)

- 2. The United States named the County as a defendant in this case, pursuant to 26 U.S.C. § 7403(b), as potentially claiming an interest in the property described in paragraph 1 above (the "Property"). (*Id.* at ¶ 10.)
  - 3. The County has a lien interest in the Property.
- 4. On October 31, 2005 and July 10, 2007, the United States filed notices of federal tax lien in the County against Richard Kegley for the liabilities described in paragraphs 13 and 23 of the United States' complaint.
- 5. The Property is encumbered by liens resulting from unpaid real estate taxes owed to the County for tax years 2011, 2012, 2013, and 2014.

1	6. The United States and the County agree that the County's lien interest in			
2	the Property arising from the unpaid real estate taxes described in paragraph 5,			
3	above, is paramount and superior to the United States' federal tax liens.			
4	7. Each party agrees to bear its respective attorney's fees.			
5				
6	Dated: June 5, 2014.			
7	Counsel for the United States Counsel for Walla Walla County			
8	MICHAEL C. ORMSBY			
9	United States Attorney  JAMES LYLE NAGLE			
10	KATHRYN KENEALLY Walla Walla County Prosecuting Assistant Attorney General Attorney			
11	240 West Alder, Suite 201			
12	Walla Walla, WA 99362-2807  MESSICA S. REIMELT  Walla Walla, WA 99362-2807  Telephone: (509) 524-5445			
13	U.S. Department of Justice Fax: (509) 524-5485  Email: jnagle@co.walla-walla.wa.us			
14	Ben Franklin Station, P.O. Box 7238 Washington, D.C. 20044			
15	Telephone: (202) 307-2176 Fax: (202) 514-6770			
16	Email: jessica.s.reimelt@usdoj.gov			
17				
18				
19	IT IS SO ORDERED, THIS 6th DAY OF June , 2014.			
20	2 14 11			
21	HONORABLE EDWARD F. SHEA			
22	UNITED STATES DISTRICT JUDGE			